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Attorneys for Defendant
FRANCES MORADA

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CASE NO. S-03-376-DFL

Plaintiff,

**STIPULATION AND PROPOSED
ORDER REGARDING
CONTINUANCE OF STATUS
CONFERENCE**

vs.

FRANCES MORADA,
LILY MIZRAHE

Defendants.

Defendant Frances Morada, through her counsel of record, Malcolm Segal, and Defendant Lily Mizrahe, through her counsel of record, Bruce Locke, and Plaintiff United States of America, through its counsel, Assistant United States Attorney John Vincent, agree and stipulate that the status conference set for March 16, 2006 may be continued to May 11, 2006 at 10:00 AM, in order to permit the parties to further investigate, review and discuss the case regarding future proceedings, and to permit the defendants the opportunity to complete interviews required in connection with a deferred prosecution agreement. This case continues to be complex within the meaning of the Speedy Trial Act due to the volume of discovery, complexity of the legal and factual issues, and the need of counsel to conduct independent investigations.

1 Accordingly, the time between the scheduled court appearance on March 16,
2 2006, and the status conference on May 11, 2006 should continue to be excluded
3 from the calculation of time pursuant to the Speedy Trial Act, due to complexity and
4 counsels' need to prepare. 18 U.S.C. §3161 (h) (8) (B) (ii) and (iv) [Local Codes
5 T2/T4].
6

7 Dated: March 10, 2006

SEGAL & KIRBY

8
9 By: /s/ Malcolm S. Segal

10 MALCOLM S. SEGAL

Counsel for Defendant Frances Morada
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12

13 Dated: March 10, 2006

MOSS & LOCKE

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15 By: /s/ Bruce Locke

16 BRUCE LOCKE

Counsel for Defendant Lily Mizrahe
17
18

19 Dated: March 10, 2006

20 By: /s/ John Vincent

21 JOHN VINCENT

Assistant United States Attorney
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23 **IT IS SO ORDERED.**

24 Dated: 3/17/2006
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26 /s/ David F. Levi

HONORABLE DAVID F. LEVI

Chief Judge, United States District Court
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